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February 21, 2018

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WC Docket No. 17-287, Bridging the Digital Divide for Low-Income Consumers
WC Docket No. 11-42, Lifeline and Link Up Reform and Modernization
WC Docket No. 09-197, Telecommunications Carriers Eligible for Universal Service Support

Dear Secretary Dortch:

On behalf of the Rainbow PUSH Coalition (“RPC”), a multi-racial, multi-issue, progressive, international membership organization fighting for social change, we encourage you to reconsider the proposals outlined in the Fourth Report and Order, Order on Reconsideration Memorandum Opinion and Order, Notice of Proposed Rulemaking and Notice of Inquiry, released on December 1, 2017, in the above-captioned proceedings, which we believe will undermine the Lifeline program and leave millions of low-income Americans without access to telecommunications services. RPC strives to protect, defend, and gain civil rights by leveling the economic and educational playing fields, and thus we are an ardent proponent of the Lifeline program and of an expansion of the program to broadband connectivity. The proposed changes to the program will restrict consumer choice, make it more difficult for low-income Americans to obtain and maintain broadband and phone connectivity, and limit provider participation.

We believe in this program and have a deep and passionate desire to see it continue to serve the most vulnerable. When poor people have their electricity cut-off, can’t pay their rent and afford their medicine, this service allows them some means of staying connected to family, friends and yes, even their church and pastor, in hopes of finding some help in times of trouble. We ask that you look at this program through the eyes of the thousands it has helped and put yourself into their shoes and ask the question: What would you do when your choices, options, alternatives are limited by bureaucrats that don’t have to live

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like you live, yet they make decisions that can make your life so hard or so much better?

This program is no panacea to poverty; simply put, it perhaps provides one with the means to find a way out.

We urge the FCC to consider the following points:

1. Rethink the Budget Cap.

Access to the Internet has never been more important. Where over 80% of Fortune 500 companies use online applications, it is imperative for unemployed people to have access to the Internet at home, to find jobs. Students who do not have home Internet would not be able to complete homework assignments, leaving them prone to falling behind their peers. Where 94% of school districts serving low-income consumers are reported to have teachers assign Internet-based homework, and 27% said more than half of their teachers were doing so, lack of broadband access would seriously threaten the educational well-being of the young population that need access to a home Internet. In order to bridge the digital divide, especially the deeper divide across races and ethnicities, the FCC should not constrict the benefits of Lifeline, for instance by imposing a budget cap, but rather it should seek alternative ways to reach a wider consumer base that can benefit from the program. The self-enforcing budget cap on the Lifeline program, as proposed by the FCC, would create disincentives and add regulatory barriers to both consumers and providers. Given that there is a much larger Hispanic and black population that is smartphone-dependent than the white population, reflecting the former population's greater reliance on smartphones than on a home Internet, RPC believes that any budget cap for phone service would interfere with the everyday needs of low-income Americans.

2. Refrain from restricting consumer choice.

The FCC should expand the Lifeline program to provide consumers with the choice of either standalone broadband or voice service or a bundled package. After all, consumers are best at determining what works for their households. If the proposed changes were implemented, then the FCC would be reducing the types of services that certain consumers can access, and the low-income Americans would not have the same options in the broadband marketplace as those that wealthier subscribers have.

3. Incentivize provider participation by removing regulatory barriers.

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a. Do not remove resellers from the Lifeline program.

Over 70 percent of wireless Lifeline consumers currently choose wireless resellers, but with the FCC's proposed ban of wireless resellers will at worst decrease consumer access to voice and broadband services under the Lifeline program, and at best decrease consumer choice and inhibit provider competition. Most of the innovations in Lifeline service offerings are attributed to wireless resellers, removal of these providers from the Lifeline market, not only limits consumer choice, but also would limit innovation in the Lifeline marketplace. Rather, the FCC should incentivize wireless resellers to innovate, thereby creating more options for low-income consumers, the then the FCC would be moving in the direction of bridging the digital divide.

b. Find alternative or eliminate eligible telecommunications carrier ("ETC") designation requirements for providers.

The FCC should also take steps to encourage facilities-based providers to participate in the Lifeline program. By streamlining the document retention requirements, the participation criteria, and creating a federal alternative to ETC designation requirements for providers, administrative burdens will be reduced, efficiency will be increased, and facilities-based service providers will be incentivized to participate. In the context of net neutrality, Chairman Pai has said that lightening regulatory burdens from Washington will unleash providers to do what they do best, which is serving their communities and providing broadband access to residents across the country. Similarly, in the context of the Lifeline program, if the FCC wants to remove regulatory barriers, promote innovation and competition, then it should do away with the heavy-handed ETC designation requirements and implement an alternative lighter-touch mechanism for facilities-based service providers.

4. Establish national verifier system for Lifeline eligibility.

RPC strongly agrees with the FCC that no waste, fraud, and abuse should result from the Lifeline program. As depicted by the U.S. Government Accountability Office study, the National Lifeline Eligibility Verifier established by the 2016 Lifeline Modernization Order could well be an alternative to the standard ETC designation that facilitates service providers' ability to concentrate their resources in serving their consumers, as they can verify the eligibility of prospective Lifeline consumers nationwide, enjoy relaxed regulatory burdens of participating in the Lifeline program, and contribute to the competitiveness of the Lifeline market that would benefit the consumer through both cost-effective and efficient means.

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For the reasons above, RPC encourages the FCC to reconsider the proposed changes that would widen the digital divide rather than bridge it. On the 50th Anniversary of the Poor People's Campaign, no digital divide should exist for any people in our nation.

Broadband access entails basic livelihood for all races and ethnicities, as it provides accessibility to resources directly related to job opportunities and educational resources. We ask you to prioritize the interests of the people we ought to serve in this country and reject the FCC's proposals on Lifeline that will devastate the families supported by Lifeline.

Sincerely,

A handwritten signature in black ink that reads "Jesse L. Jackson, Sr." The signature is written in a cursive, flowing style.

Rev. Jesse L. Jackson, Sr.
Founder & President
Rainbow PUSH Coalition

Cc:

The Honorable Ajit Pai, FCC Chairman
The Honorable Mignon Clyburn, FCC Commissioner
The Honorable Michael O'Riely, FCC Commissioner
The Honorable Brendan Carr, FCC Commissioner
The Honorable Jessica Rosenworcel, FCC Commissioner